Beneficial Innovations, Inc. v. Blockdot, Inc. et al Doc. 22

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION

BENEFICIAL INNOVATIONS, INC.,

Plaintiff,

v.

BLOCKDOT, INC., CAREERBUILDER, LLC., CNET NETWORKS, INC., DIGG, INC., EBAUM'S WORLD, INC., JABEZ NETWORKS, INC., THE NEW YORK TIMES CO., THE WASHINGTON POST CO., THE WEATHER CHANNEL INTERACTIVE, INC.,

Defendant.

CIVIL ACTION NO. 2:07-CV-263 (TJW/CE)

Jury Trial Demand

JABEZ NETWORKS, INC.'S UNOPPOSED MOTION FOR EXTENSION OF TIME IN WHICH TO ANSWER, MOVE, OR OTHERWISE RESPOND TO PLAINTIFF'S AMENDED COMPLAINT

Defendant Jabez Networks, Inc. ("Jabez"), without waiving any defenses or any matters that might be presented pursuant to Federal Rule of Civil Procedure 12(b) or any other rule or law, files this unopposed motion for extension of time in which to answer, move, or otherwise respond to Plaintiff Beneficial Innovations, Inc.'s ("Beneficial") Amended Complaint and would respectfully show the Court as follows:

Jabez has requested and Beneficial has agreed to an extension of Jabez's time to respond in any manner whatsoever including answer, motion or other pleading of any type to Beneficial’s Amended Complaint. Specifically, Jabez requests, and Beneficial does not oppose, an extension of time up to and including September 4, 2007.

A proposed Order granting this unopposed motion is attached for the Court’s convenience.

Dockets.Justia.com

DATE: July 20, 2007

Respectfully submitted,

GIBSON, DUNN & CRUTCHER LLP

By: /s/ Mark N. Reiter

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ATTORNEYS FOR DEFENDANT JABEZ NETWORKS, INC.

CERTIFICATE OF CONFERENCE

I certify that counsel for Jabez Networks, Inc. conferred with counsel for Beneficial Innovations, Inc. on July 19, 2007 regarding the subject matter of the foregoing motion. The motion is unopposed.

/s/ Steven M. Geiszler ________________________
Steven M. Geiszler

CERTIFICATE OF SERVICE

I certify that the foregoing document was filed electronically on July 20, 2007 pursuant to Local Rule CV-5(a) and has been served on all counsel who have consented to electronic service. Any other counsel of record will be served by first class U.S. mail on this same date.

/s/ Steven M. Geiszler ________________________
Steven M. Geiszler